

DELIBERATIVE - NOT FOR RELEASE
RCRA Briefing on CWMNW ORU System
Sep 6, 2018

Briefing Purpose: Provide follow up information regarding regulatory applicability for the Organic Recovery Unit, ORU-2, System at CWMNW (b) (5)

Facility:

Chemical Waste Management of the Northwest, CWMNW, Arlington, OR, has submitted a Class 3 Permit Modification Request to replace ORU-1

- This is an ODEQ permit they are authorized
- (b) (5)

Comment and Air Program Interest

- Commenter TD*X (**US Ecology**) direct competitor for the management of the same waste stream (oil-bearing hazardous wastes from petroleum refining, production, or transportation practices) Managed in the same manner. (b) (5)
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Waste Stream and specific exemption 261.6(a)(3)(iv)(C)

(C) Oil reclaimed from OBHW, which reclaimed oil is burned as a fuel without reintroduction to a refining process, so long as the reclaimed oil meets the used oil fuel specification under §279.11 of this chapter.

- From OBHW
- Reclaimed not produced
- Not refined
- Even without refining can meet spec
- Burned as fuel

(b) (5)

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(b) (5)

- Not specific to any R6 facility, the request is regarding in general any facility where
 - TDU is at a TSDF
 - Reclaiming oil from OBHW
 - Heats material to vaporize, remove, and separate organic constituents from solids
 - Separated organic constituents are condensed and recovered as liquid oil
 - The TDU generates a vent gas after the condensing stream
 - Reclaimed liquid oil processed in TDU meets the exemption 261.6(a)(3)(iv)(C)

R6 Letter Determination

- Heating hazardous waste to a gaseous state is subject under RCRA as treatment of hazardous waste
- Combustion of vent gas is considered thermal treatment that is regulated by RCRA
- Letter addresses applicability regardless of whether vent gas is reintroduced into the TDU or not

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